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August 23, 2019

Ms. Roxanne L. Rothschild
Executive Secretary
National Labor Relations Board
1015 Half Street SE
Washington, DC 20570-0001

Via E-File

RE: Respondents' Supplemental Statement of Authority in Support of Their
Motion to Dismiss Complaints:

Thomas Charles Pace, III v. Papa John's International, Inc.
NLRB Case No. 10-CA-203499

Benjamin Greene v. Papa John's
NLRB Case No. 18-CA-197952

Dear Ms. Rothschild:

On August 14, 2019, after all briefs supporting and opposing Respondents' Motion To Dismiss were filed, the board issued its decision in *Cordua Restaurants, Inc.*, 368 N.L.R.B. No. 43 (2019). The Board held that an employer does not violate the Act when it insists that an employee sign an arbitration agreement containing a class action waiver. To the extent that the consolidated Complaint in these cases alleges threats in violation of §8(a)(1) of the Act in connection with the employer's request or insistence that employees sign the arbitration agreement, those allegations must be dismissed. See Case 10-CA-203499, Complaint ¶¶3(c), (d); Case 18-CA-197952, Complaint ¶¶6(c), (d).

Sincerely,

s/ Bruce J. Douglas

Bruce J. Douglas

BJD:plp

cc: Hon. Paul A. Bogas (via e-mail)
Kerstin I. Meyers, Esq. (via e-mail)
Mr. Thomas Charles Pace, III (via e-mail)
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